

STATE PLAN PEER REVIEW CRITERIA Peer Review Panel Notes Template

STATE: Montana



U.S. Department of Education
April 5, 2017

SECTION A: TITLE I, PART A: IMPROVING BASIC PROGRAMS OPERATED BY LEAS

A.1: Challenging State Academic Standards and Assessments

Note: State Plan template item A.1 is submitted as part of the separate assessment peer review process consistent with ESEA section 1111(b) and 34 CFR § 200.2(d), and thus has no applicable peer review criteria in this document.

A.2: Eighth Grade Math Exception (ESEA section 1111(b) (2) (C) and 34 CFR § 200.5(b) (4))

Note: State Plan template items A.2.i and A.2.ii require binary yes/no responses from SEAs, and thus have no applicable peer review criteria.

A.2.iii: Strategies (ESEA section 1111(b) (2) (C); 34 CFR § 200.5(b) (4))

- If applicable,¹ does the SEA describe, regarding the 8th grade math exception, its strategies to provide all students in the State the opportunity to be prepared for and take advanced mathematics coursework in middle school (e.g., appropriate data and evidence that the strategies are likely to provide all students in the State that opportunity)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	N/A: MT indicated that it does not administer an end of course mathematics assessment and, as a result, is not requesting an exemption.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s)) <input checked="" type="checkbox"/> N/A
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet</i>	

¹ In order for an SEA to exempt an 8th grade student from the mathematics assessment typically administered in 8th grade under ESEA section 1111(b)(2)(B)(v)(I)(aa), it must ensure that: a. the student instead takes the end-of-course mathematics assessment the State administers to high school students under ESEA section 1111(b)(2)(B)(v)(I)(bb); b. the student's performance on the high school assessment is used in the year in which the student takes the assessment for purposes of measuring academic achievement under ESEA section 1111(c)(4)(B)(i) and participation in assessments under ESEA section 1111(c)(4)(E); and c. in high school: (1) the student takes a State-administered end-of-course assessment or nationally recognized high school academic assessment as defined in 34 CFR § 200.3(d) in mathematics that is more advanced than the assessment the State administers for 8th graders under ESEA section 1111(b)(2)(B)(v)(I)(bb); (2) the State provides for appropriate accommodations consistent with 34 CFR § 200.6(b) and (f); and (3) the student's performance on the more advanced mathematics assessment is used for purposes of measuring academic achievement under ESEA section 1111(c)(4)(B)(i) and participation in assessments under ESEA section 1111(c)(4)(E).

A.3: Native Language Assessments (ESEA section 1111(b) (2) (F) and 34 CFR § 200.6(f) (2) (ii) and (f) (4))

A.3.i: Definition

- Does the SEA provide its definition of “languages other than English that are present to a significant extent in the participating student population”?
- Does the SEA identify the specific languages that meet that definition?
- Does the SEA’s definition include at least the most populous language other than English spoken by the State’s participating student population?
- In determining which languages are present to a significant extent in the participating student population, does the SEA describe how it considered languages other than English that are spoken by distinct populations of English learners, including English learners who are migratory, English learners who were not born in the United States, and English learners who are Native Americans?
- In determining which languages are present to a significant extent in the participating student population, does the SEA describe how it considered languages other than English that are spoken by a significant portion of the participating student population in one or more of the State’s LEAs, as well as languages spoken by a significant portion of the participating student population across grade levels?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT’s definition of “languages other than English that are present to a significant extent in the participating student population” is a language spoken by more than 15% of the student population (p. 14). According to the state plan response, no languages meet this definition. MT’s plan seems to indicate that the most populous non-English languages are Crow and Blackfoot, but neither of these is included in the definition. It is not clear how MT considered languages spoken by distinct populations. No mention is made in the state plan of student populations in particular LEAs or at particular grade levels.</p> <p>Also, assuming a K-12 population of about 150,000 students, 15% is quite a high bar to set for any one language (about 22,500 students). This number seems high, both in absolute terms, and relative to the bar set in other states.</p>
<i>Strengths</i>	<p>MT’s definition is clear and concise.</p>
<i>Weaknesses</i>	<p>Besides not basing a significant language on at least the most prevalent language other than English, 15% is quite a high benchmark.</p> <p>There were mentions of other languages - in particular the most used non-English languages are Crow and Blackfoot, but neither of these is included in the definition and it was noted that most have English as their home language. It is unclear how MT considered other languages and there was no indication that the state assessed languages by region, LEAs, or schools.</p> <p>There’s no mention of student populations in particular LEAs or grade levels.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (# peer reviewer(s))</p> <p><input checked="" type="checkbox"/> No (4 peer reviewer(s))</p>
<i>If no, describe</i>	<p>MT must define at least the most populous language as significant.</p>

<i>the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>MT should provide languages present in particular LEAs or grade levels.</p> <p>If MT’s definition of significant language is changed to include both the most prominent language and any language meeting specific criteria, then MT should provide its rationale for setting the criteria at 15%.</p>
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A.3.ii: Existing Assessments in Languages other than English

- Does the SEA identify any existing assessments that it makes available in languages other than English, and specify for which grades and content areas those assessments are available?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MT does not have existing assessments in languages other than English because ELs represent only 2% of students.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.3.iii: Assessments not Available and Needed

- Does the SEA indicate the languages other than English that are present to a significant extent in the participating student population, as defined by the SEA and identified under A.3.i of the consolidated State plan, for which yearly student academic assessments are not available and are needed?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Since MT does not have any languages other than English that it considers to be present to a significant extent, MT indicated that the need to have academic assessments in other languages is not applicable.</p> <p>There was no indication of stakeholder involvement and whether there was any demand for native language assessments.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	There was no indication of stakeholder involvement or whether there was any demand for native language assessments.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))

<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	
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A.3.iv: Efforts to Develop Assessments

- Does the SEA describe how it will make every effort to develop assessments in, at minimum, languages other than English that are present to a significant extent in the participating student population, as defined by the SEA and identified under A.3.i of the consolidated State plan template?
- Does the SEA’s description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include the State’s plan and timeline for developing such assessments?
- Does the SEA’s description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include a description of the process the State used to:
 - 1) gather meaningful input on the need for assessments in languages other than English;
 - 2) collect and respond to public comment; and
 - 3) Consult with educators, parents and families of English learners, students, as appropriate and other stakeholders?
- If applicable, does the SEA’s description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include an explanation of the reasons (e.g., legal barriers) the State has not been able to complete the development of such assessments despite making every effort?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Since MT does not have any languages other than English that it considers to be present to a significant extent, it does not detail any plans for developing assessments in other languages.</p> <p>MT does not indicate whether it has a monitoring process to determine whether assessments in other languages may become necessary.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	MT does not indicate whether it has a monitoring process to determine whether assessments in other languages may become necessary.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MT should describe how it will make every effort to monitor and develop assessments in, at a minimum, a language other than English that is present to a significant extent in the participating student population.

A.4: Statewide Accountability Systems & School Support and Improvement (ESEA section 1111(c) and (d))

A.4.i: Subgroups (ESEA section 1111(b) (3), 1111(c) (2))

A.4.i.a: Major Racial and Ethnic Subgroups of Students (ESEA section 1111(c) (2) (B))

- Does the SEA list each major racial and ethnic group that the SEA includes as a subgroup of students in its accountability system?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT has identified the following racial and ethnic groups in the state:</p> <ul style="list-style-type: none"> • White 79% • American Indian 11.2% • Hispanic 4.5% • Asian .8% • Black .9% • Pacific Islander .2% p. 15 <p>MT indicates that only White and American Indian are substantial (in representation (p. 16). It is unclear whether these are actually the subgroups reported for accountability purposes; this should be clarified (e.g. on p. 19 and p.21 only white and American Indian are included in the table). Although some subgroups have a low overall percentage, they may still meet minimum Ns in some schools.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>It is unclear if MT intends to include any racial and ethnic groups outside of White and American Indian for accountability purposes.</p> <p>Some peers were concerned that Hispanics are not considered a significant subgroup.</p> <p>MT should provide its rationale to support the identification of only White and American Indian as significant subgroups for accountability purposes.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.i.b: Additional Subgroups at SEA Discretion

- If applicable, does the SEA describe any additional subgroups of students other than the statutorily required subgroups (*i.e.*, economically disadvantaged students, students from each major racial and ethnic group, children with disabilities, and English learners) included in its statewide accountability system?

	<i>Peer Response</i>
<i>Peer Analysis</i>	N/A: MT indicates this is not applicable.

<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s)) X N/A
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.i.c: Previously Identified English Learners

Note: State Plan template item A.4.i.c requires a binary yes/no response from SEAs, and thus has no applicable peer review criteria.

A.4.i.d: If Applicable, Exception for Recently Arrived English Learners

Note: This peer review criterion applies only if a State selects the third option in item A.4.i.d in the consolidated State plan template for recently arrived English learners under which the State applies the exception under ESEA section 1111(b)(3)(A)(i) or the exception under ESEA section 1111(b)(3)(A)(ii) to a recently arrived English learner.

- Does the SEA describe how it will choose which exception applies to a recently arrived English learner (e.g., a statewide procedure that considers English language proficiency level in determining which, if any, exception applies)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	N/A: MT intends to use exception 1111(b) (3) (A) (i).
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s)) X N/A
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.ii: Minimum N-Size (ESEA section 1111(c) (3) (A))

A.4.ii.a: Minimum N-Size for Accountability (ESEA section 1111(c) (3) (A) (i))

- Does the SEA provide the minimum number of students that the State determines is necessary to meet the requirements of any provisions under Title I, Part A of the ESEA that require disaggregation of

information by each subgroup of students for accountability purposes, including annual meaningful differentiation and identification of schools?

- Is the minimum number of students the same State-determined number for all students and for each subgroup of students in the State (*i.e.*, economically disadvantaged students, students from each major racial and ethnic group, children with disabilities, and English learners) for accountability purposes?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The MT plan states on page 17 that the minimum n-size for the purposes of disaggregating subgroups for accountability purposes is 10. And that 10 are appropriate for all accountability purposes (including all student calculations). With an n-size of 10, 92 schools would be excluded and 582 would be included. MT does not present a plan such as using multiple years or another strategy to include the 92 schools.
<i>Strengths</i>	
<i>Weaknesses</i>	MT identifies that 92 schools are excluded from accountability due to the All Students group being less than 10.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.ii.b: Statistical Soundness of Minimum N-Size (ESEA section 1111(c) (3) (A) (i))

- Is the selected minimum number of students statistically sound?²

	<i>Peer Response</i>
<i>Peer Analysis</i>	MT states on page 10 that the minimum n-size of 10 allows for comparisons across schools and subgroups within Montana’s rural nature and small school sizes. However, the MT plan does not provide any statistical evidence that an n-size of 10 is statistically sound and a better choice than other n-sizes.

² Consistent with ESEA section 1111(i), information collected or disseminated under ESEA section 1111 shall be collected and disseminated in a manner that protects the privacy of individuals consistent with section 444 of the General Education Provisions Act (20 U.S.C. 1232g, commonly known as the “Family Educational Rights and Privacy Act of 1974”). When selecting a minimum n-size for reporting, States should consult the Institute of Education Sciences report “[Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information](#)” to identify appropriate statistical disclosure limitation strategies for protecting student privacy.

	Based on the numbers they provide (p. 17), about 13% of Title I schools would be excluded with an N size of 10. Given the rural nature and sparse, largely homogeneous population, the N size seems appropriate, a balance between providing confidentiality and excluding too many students from reporting.
<i>Strengths</i>	
<i>Weaknesses</i>	There is no discussion of statistical soundness It would be illustrative if the State provided data on what percent of schools do not have to report on each subgroup with the N size of 10.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MT should provide evidence of the statistical soundness of an n-size of 10.

A.4.ii.c: How the SEA Determined Minimum N-Size (ESEA section 1111(c) (3) (A) (ii))

- Does the SEA describe how it determined the minimum number of students?
- Does the description include how the State collaborated with teachers, principals, other school leaders, parents, and other stakeholders when determining such minimum number?

<i>Peer Response</i>	
<i>Peer Analysis</i>	MT indicates on page 17 that broad stakeholder consultation went into determining minimum N size (p. 17). The description of the process is a bit general and doesn't provide the specific data that the SEA used to determine "that the proposed minimum n allows for the most schools possible to be included in the accountability process while still maintaining statistical validity and not revealing any personally identifiable information" (p. 17).
<i>Strengths</i>	
<i>Weaknesses</i>	MT presented its rationale for its N-size decision; however, MT could be more specific about the process and discussion with stakeholders that informed the decision.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.ii.d: Minimum N-Size and Ensuring Student Privacy (ESEA section 1111(c) (3) (A) (iii))

- Does the SEA describe how it ensures that the minimum number of students will protect the privacy of individual students?³

	<i>Peer Response</i>
<i>Peer Analysis</i>	MT's response indicates that the Student Records Confidentiality Policy (p. 17) "establishes procedures and responsibilities under federal and state laws governing the access, use, and dissemination of confidential, sensitive, and/or restricted student information by the OPI." This policy does not address how it ensures that the minimum N size will protect individual student privacy.
<i>Strengths</i>	
<i>Weaknesses</i>	It is uncertain whether this policy ensures that the minimum N size will protect individual student privacy. MT does not indicate specifically how it will mask data in cases when percentages equal 0 or 100. The policy link did not work consistently and the policy should be included in the plan.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MT must explain how, and provide evidence that, the policy explicitly provides procedures to protect individual student privacy when reporting school accountability results.

A.4.ii.e: If Applicable, Minimum N-Size for Reporting

- If the SEA's minimum number of students for purposes of reporting is lower than the minimum number of students for accountability purposes, does the SEA provide the minimum number of students for purposes of reporting?
- Is the SEA's minimum number of students for purposes of reporting consistent with the requirements in ESEA section 1111(i), including with respect to privacy and statistical reliability?

	<i>Peer Response</i>
<i>Peer Analysis</i>	N/A: MT indicates that it is not applicable because the N for reporting is not less than for accountability.

³ See footnote 5 above for further guidance.

<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s)) <input checked="" type="checkbox"/> N/A
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iii: Establishment of Long-Term Goals (ESEA section 1111(c) (4) (A))

A.4.iii.a: Academic Achievement (ESEA section 1111(c) (4) (A) (i) (I) (aa))

A.4.iii.a.1: Long-term goals

- Does the SEA identify (*i.e.*, by providing a numeric measure) and describe the long-term goals for all students for improved academic achievement, as measured by grade-level proficiency on the annual statewide reading/language arts and mathematics assessments (which must apply the same academic achievement standards to all public school students in the State, except those with the most significant cognitive disabilities)?
- Does the SEA identify and describe long-term goals for each subgroup of students?
- Does the SEA’s description include baseline data for all students and for each subgroup of students?
- Does the SEA’s description include the timeline for meeting the long-term goals?
- Is the time line the same multi-year length of time for all students and for each subgroup of students?
- Are the long-term goals ambitious?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT provides baseline data for non-high schools, along with yearly goals for all students and student subgroups. There is no baseline for HS proficiency long term goals because ACT proficiency cuts have not been established (p.18). The timeline is six years for all students and subgroups.</p> <p>The strategy of having a goal of an annual four percent reduction in the number of students not proficient results in yearly targets that are small compared to the percent of students still not proficient. Thus, after six years, the cumulative reduction still results in vast numbers of students are still not proficient. For the All Students category, less than 2% of students increase in proficiency per year. Using a “percentage reduction in non-proficiency” strategy produced targets that are attainable, but not ambitious.</p> <p>There is no rationale to support the claim that this long term goal is ambitious.</p>
<i>Strengths</i>	<p>The formula results in greater gains for schools further behind and smaller gains for schools growing each year.</p> <p>The goals are clear and measurable, and the timelines are the same for all</p>

	subgroups.
<i>Weaknesses</i>	MT claims that the goal is attainable and ambitious; however, a 4% reduction does not seem to be particularly ambitious – especially in ELL and students with disabilities (SWD) subgroups. Given the low baseline, the improvement for ELLs and SWDs does not facilitate meaningful gap closing. There is no rationale provided for how the SEA determined that 4% improvement per year was set as an ambitious goal.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MT should provide detailed information in tables B and C as to what grades are included. Specifically MT must provide baseline data for high schools separately given that high schools use the ACT (which likely has different baseline proficiency rates). MT should provide additional support to justify that a 4% annual target is ambitious.

A.4.iii.a.2: Measurements of interim progress

- Does the SEA provide measurements of interim progress toward meeting the long-term goals for all students?
- Does the SEA provide measurements of interim progress toward meeting the long-term goals for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The Plan provides tables (B and C) which indicate targets for interim progress for all students and each subgroup of students. HS MIPs (measures of interim progress) are not provided.
<i>Strengths</i>	Elementary and middle school MIPs decrease over time, which likely reflects realistic patterns of improvement. These are clear and measurable interim goals.
<i>Weaknesses</i>	HS MIPs (measures of interim progress) are not provided.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MT must provide HS MIPs (measures of interim progress).

A.4.iii.a.3: Improvement necessary to close statewide proficiency gaps

- Do the long-term goals and measurements of interim progress for academic achievement take into account the improvement necessary for subgroups of students who are behind in reaching those goals

to make significant progress in closing statewide proficiency gaps, such that the State’s long-term goals require greater rates of improvement for subgroups of students that are lower achieving?

	<i>Peer Response</i>
<i>Peer Analysis</i>	By establishing that all student groups should increase proficiency by 4% per year, there is a greater rate of improvement expected for lower performing groups than for higher performing ones (see long-term expected proficiency rates in the charts on p. 19 and 20.)
<i>Strengths</i>	N/A
<i>Weaknesses</i>	N/A
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iii.b: Graduation Rate (ESEA section 1111(c) (4) (A) (i) (I) (bb))

A.4.iii.b.1: Long-term goals for four-year adjusted cohort graduation rate

- Does the SEA identify and describe the long-term goals for the four-year adjusted cohort graduation rate for all students?
- Does the SEA identify and describe the long-term goals for the four-year adjusted cohort graduation rate for each subgroup of students?
- Does the SEA’s description include baseline data for all students and for each subgroup of students?
- Does the SEA’s description include the timeline for meeting the long-term goals?
- Is the timeline the same multi-year length of time for all students and for each subgroup of students?
- Are the long-term goals ambitious?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The Plan includes a table (Table D, pg. 21) which presents baseline and long-term graduation rate goal for all students and subgroups of students. It is assumed, but not stated, that the rate is a four-year adjusted cohort graduation rate. Table D specifies yearly goals for each of the six years of the timeline, which is the same timeline for all students and subgroups. Some peers felt that the goals are not ambitious for the “all students”, and White subgroup, with the 2022 target only around 4% higher than the baseline six years earlier.</p> <p>In review of Table D, it seems to some peers that the graduation rates are somewhat ambitious; however it is unclear how MT is connecting the graduation rate with academic proficiency rates. In review of all tables, there seems to be a misalignment in expectations of proficiency and graduation.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	Some reviewers had concerns about the goal for White students and “all” student groups not being ambitious.

<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewer(s)) <input checked="" type="checkbox"/> No (2 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MT should provide support that the targets for the White student and All student groups are ambitious.

A.4.iii.b.2: If applicable, long-term goals for each extended-year adjusted cohort graduation rate

- If applicable (*i.e.*, if the SEA chooses, at its discretion, to establish long-term goals for one or more extended-year rates), does the SEA identify and describe the long-term goals for each extended-year adjusted cohort graduation rate for all students?
- If applicable (*i.e.*, if the SEA chooses, at its discretion, to establish long-term goals for one or more extended-year rates), does the SEA identify and describe the long-term goals for each extended-year adjusted cohort graduation rate for each subgroup of students?
- Does the SEA’s description include baseline data for all students and for each subgroup of students?
- Does the SEA’s description include the timeline for meeting the long-term goals?
- Is the timeline the same multi-year length of time for all students and for each subgroup of students?
- Are the long-term goals ambitious?
- Are the long-term goals more rigorous than the long-term goals set for the four-year adjusted cohort graduation rate?

	<i>Peer Response</i>
<i>Peer Analysis</i>	N/A: This is not applicable within the MT application because MT does not use extended year rates.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s)) X N/A
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iii.b.3: Measurements of interim progress

- Does the SEA provide measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate for all students?
- Does the SEA provide measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT provides yearly measurements of interim progress for graduation rate for all students and subgroups in Table D and Appendix A. The MIPS are 4% decreases in students not graduating per year and the rate was calculated using the same method as for determining progress for achievement.</p> <p>There was some concern that MIPS for the White and All students groups do not appear ambitious.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	There was some concern that MIPS for the White and All student groups do not appear ambitious.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iii.b.4: Improvement necessary to close statewide graduation rate gaps

- Do the long-term goals and measurements of interim progress for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate take into account the improvement necessary for subgroups of students who are behind in reaching those goals to make significant progress in closing statewide graduation rate gaps, such that the State’s long-term goals require greater rates of improvement for subgroups of students that graduate from high school at lower rates?

	<i>Peer Response</i>
<i>Peer Analysis</i>	Using the methodology of 4% decrease in the number of students not graduating, MT suggests that the gap in graduation rates for each subgroup will be closed at a faster pace. The MT Plan requires larger improvements in graduation rates for subgroups who are graduating at lower rates at baseline
<i>Strengths</i>	Formula, while not simple, is fairly transparent so stakeholders can calculate expected gap closing in the coming year.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iii.c: English Language Proficiency (ESEA section 1111(c) (4) (A) (ii))

A.4.iii.c.1: Long-term goals

- Does the SEA identify and describe the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency, as measured by the statewide English language proficiency assessment?
- Does the SEA’s description include baseline data?
- Does the SEA’s description include the State-determined timeline for English learners to achieve English language proficiency?
- Is the long-term goal ambitious?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT indicates that the target for ELs to grow at least 0.5 points on the composite score on the World Class Instructional Design and Assessment (WIDA) access test each year. It is unclear whether this refers to half a level on ACCESS or 0.5 points on the composite.</p> <p>MT’s definition of proficiency is a score of 5.0 or higher, but it is unclear what this leads to in terms of a goal related to progress in English proficiency. There is no connection between progress and meeting long term goals.</p> <p>The response is not clear as to whether MT’s long term goals are based on attainment or progress towards English language proficiency.</p> <p>The response is in terms of proficiency and there is no baseline proficiency data presented.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	One peer indicated that MT meets the requirements of this element based on table E (p. 22), but other peers were not convinced because the narrative did not match the table and referred to attainment.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer(s)) <input checked="" type="checkbox"/> No (3 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MT needs to define progress as either attainment or as growth towards English proficiency. Specifically if MT uses growth toward proficiency, then MT must specify whether student progress is 0.5 scale score points on the composite or 0.5 levels.

A.4.iii.c.2: Measurements of interim progress

- Does the SEA provide measurements of interim progress toward the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT provides MIPs based on the same formula for achievement and graduation rate.</p> <p>Table E – page 22 provides an overview of the percentage of students making progress toward proficiency if meeting the target of .5 percent each year.</p>
<i>Strengths</i>	Some peers felt that the MIPs result in reasonable improvement as the overall improvement of about 3% per year is achievable and leads to substantively meaningful improvement over the 5 years.
<i>Weaknesses</i>	<p>It is unclear whether MT is referring to proficiency or progress towards proficiency because table E (p.22) indicates progress while the text in response to the previous question refers to proficiency.</p> <p>Some peers were concerned that progress towards proficiency decreases over time.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iv: Indicators (ESEA section 1111(c) (4) (B), 1111(c) (4) (E) (ii))

Note: A single indicator may consist of multiple components or measures. Peers must review each such component or measure for compliance with all of the required elements.

A.4.iv.a: Academic Achievement

- Does the SEA describe the Academic Achievement indicator used in its statewide accountability system, including that the SEA uses the same indicator for all schools in all LEAs across the State?
- Does the description include how the SEA calculates the indicator, including: 1) that the calculation is consistent for all schools, in all LEAs, across the State; 2) a description of the weighting of reading/language arts achievement relative to mathematics achievement; 3) if the State uses one, a description of the performance index; 4) if, at the high school level, the indicator includes a measure of student growth, a description of the growth measure(e.g., a growth model); and 5) if the State averages data, a description of how it averages data across years and/or grades (e.g., does the State use a uniform averaging procedure across all schools)?
- Is the indicator valid and reliable?
- Is the indicator based on the SEA’s long-term goals?
- Can the indicator be disaggregated for each subgroup of students?
- Is the indicator measured by grade-level proficiency on the annual statewide reading/language arts and mathematics assessments?

- Does the indicator measure the performance of at least 95 percent of all students and 95 percent of all students in each subgroup?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT indicates that student performance on the Smarter Balanced Assessment (SBA) in Mathematics and English Language Arts will be used to measure proficiency in academic achievement for grades 3-8, with ACT performance the assessment for high school. The Plan does not indicate if all students statewide take the ACT. The results of the ACT and SBA can be disaggregated by student subgroups.</p> <p>MT does not specify any weighting related to the individual mathematics and ELA test results, though it might be assumed that the ELA and Math results are equally weighted at 50% each.</p> <p>MT does not specify if the SBA and ACT measures the performance of at least 95% of students.</p>
<i>Strengths</i>	MT links long-term goals to proficiency in language arts and math.
<i>Weaknesses</i>	<p>MT does not indicate how the ELA and math will be weighted. There is no description of how ACT scale scores will be used as an indicator or when ACT performance levels will be available for use.</p> <p>MT suggests that the indicator is aligned to the SEA’s long term goals, but no actual reference to the goals is provided. There is no mention of the percentage of students that are tested.</p> <p>95% participation was not explicitly addressed for all students and by subgroups.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>MT must clarify when ACT proficiency levels will be available for use in the accountability system.</p> <p>MT must clarify the weights for math and ELA within the Achievement indicator.</p> <p>MT must provide data that 95% of students participate in the ACT and SBA tests to show that the indicator measures the performance of at least 95 percent of all students and 95 percent of all students in each subgroup.</p>

A.4.iv.b: Other Academic Indicator for Elementary and Secondary Schools that are Not High Schools

Note: If the SEA uses a different Other Academic indicator for each grade span, peer reviewers must separately review each indicator that an SEA submits. For example, if an SEA submits one Other

Academic indicator for elementary schools and a different Other Academic indicator for middle schools, then peer reviewers will provide feedback, using the criteria below, separately for each indicator.

- Does the SEA describe the Other Academic indicator used in its statewide accountability system for public elementary and secondary schools that are not high schools, including that the SEA uses the same indicator and calculates it in the same way for all elementary and secondary schools that are not high schools, in all LEAs, across the State, except that the indicator may vary by each grade span?
- Does the SEA describe, if applicable, how it averages data across years and/or grades (e.g., does the State use a uniform averaging procedure across all schools)?
- If the SEA uses a different indicator for each grade span, does it describe each indicator, including the grade span to which it applies?
- If the Other Academic indicator is not a measure of student growth, is the indicator another valid and reliable statewide academic indicator?
- If the Other Academic indicator is not a measure of student growth, does the indicator allow for meaningful differentiation in school performance?
- Can the indicator be disaggregated for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT will measure Math and ELA growth on the SBA for K-8 schools using individual student improvement over a two-year period. The individual student growth scores will be aggregated to the school level and summarized for all students and by student subgroup. It is not clear from the narrative how only two years of SBA scores provide data to show “the number of standard deviations above or below the mean of that particular student’s test score for each year.” (p. 23).</p> <p>The description on p. 23 is not clear because the narrative implies that means of student scores are used in the analyses to determine growth; however, a student’s score is a single score and if in fact it is a mean then it should be made clear what this mean represents.</p> <p>The results of the indicator may not provide for valid inference as a positive change in normalized results may reflect less negative actual growth.</p>
<i>Strengths</i>	This other academic achievement measure is a measure of growth.
<i>Weaknesses</i>	<p>The description on p. 23 is not clear because the narrative implies that means of student scores are used in the analyses to determine growth; however, a student’s score is a single score and if in fact it is a mean then it should be made clear what this mean represents.</p> <p>There is no indication of whether regression to the mean will impact gain results in ways unintended by MT.</p> <p>The results of the indicator may not provide for valid inference as a positive change in normalized results may reflect less negative actual growth. Subtracting yearly normalized results will allow schools to earn credit for growth relative to the state as a whole, so if MT performance decreases, overall, then a school that had a smaller decrease will appear to have grown.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the</i>	MT should describe more clearly how scores are normalized and how the

<i>specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>normalized scores are used in the accountability system.</p> <p>MT should justify the use of differences of normalized results as providing useful results to inform the accountability system.</p>
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A.4.iv.c: Graduation Rate

- Does the SEA describe the Graduation Rate indicator used in its statewide accountability system for public high schools in the State, including that the SEA uses the same indicator across all LEAs in the State?
- Does the description include how the SEA calculates the indicator including: 1) that the calculation is consistent for all high schools, in all LEAs, across the State; 2), if applicable, whether the SEA chooses to lag adjusted cohort graduation rate data; and 3) if applicable, how the SEA averages data (e.g., consistent with the provisions in ESEA section 8101(23) and (25), which permit averaging graduation rate data over three years for very small schools)?
- Is the indicator valid and reliable?
- Is the indicator based on the SEA’s long-term goals?
- Is the indicator based on the four-year adjusted cohort graduation rate?
- If the State, at its discretion, also includes one or more extended-year adjusted cohort graduation rates, does the description include how the four-year adjusted cohort graduation rate is combined with that rate or rates within the indicator?
- If applicable, does the SEA’s description include how the State includes in its four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rates students with the most significant cognitive disabilities assessed using an alternate assessment aligned to alternate academic achievement standards under ESEA section 1111(b) (2) (D) and awarded a State-defined alternate diploma under ESEA section 8101(23) and (25)?
- Can the indicator be disaggregated for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT uses a four-year adjusted cohort graduation rate for all LEAs and across the State. The rate can be disaggregated for each subgroup of students. The narrative did not address how the State has determined the indicator’s validity and reliability.</p> <p>The Plan did not address how the state includes in the graduation rate the data for students with the most significant cognitive disabilities.</p> <p>MT does not indicate how the graduation rate will be used in very small schools.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>There is no mention of how MT will account for students with the most significant cognitive disabilities in the graduation rate.</p> <p>MT does not indicate how very small schools are handled (e.g., whether and how data are averaged across years).</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information</i>	MT must clarify how the state will account for students with the most significant cognitive disabilities in the graduation rate.

<i>or clarification that an SEA must provide to fully meet this requirement</i>	MT must indicate how very small schools are handled (e.g., whether and how data are averaged across years).
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A.4.iv.d: Progress in Achieving English Language Proficiency Indicator

- Does the SEA describe the Progress in Achieving English Language Proficiency indicator used in its statewide accountability system, including that the SEA uses the same indicator across all LEAs in the State?
- Is the indicator valid and reliable?
- Is the Progress in Achieving English Language Proficiency indicator aligned with the State-determined timeline described in A.4.iii.c.1?
- Does the indicator consistently measure statewide the progress of all English learners in each of grades 3 through 8 and in the grade for which such English learners are otherwise assessed under ESEA section 1111(b)(2)(B)(v)(I) during grades 9 through 12?
- Does the SEA’s description include the State’s definition of English language proficiency, based on the State English language proficiency assessment?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>WIDA ACCESS 2.0 data will be used to compare the current year to the previous year for a progress measurement. MT does not specify what is compared from one year to the next. English language proficiency is defined (p. 22) as a composite score of 5 or sub scores of 4 on all language skills. The plan specifies that this is applied to all students in K-12, regardless of the proficiency level at which they started, their age, or any other consideration.</p> <p>The timeline for exiting is not specified – specifically it is not clear what the timeline is for ELs entering at different initial levels.</p> <p>It appears, although is not clear, that MT expects 0.5 levels of growth irrespective of time in program or initial English proficiency level.</p>
<i>Strengths</i>	N/A
<i>Weaknesses</i>	<p>It is unclear whether the proposed methodology is reliable or allows for valid claims about progress. Progress does not appear to be related to expected time to exit nor initial ELP level. Progress expectations appear to be linear and the literature overwhelming indicates that language development is not linear. The indicator is likely biased against schools that ELs comes in at lower initial ELP levels. This occurs because students whose initial levels are lower experience different growth over time than students who enter with higher initial levels of performance. Similarly bias may occur by grade span.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet</i>	<p>MT must provide specific detail regarding this indicator; including the expected time to proficiency; expected annual growth; and, what the year to year comparisons are.</p>

A.4.iv.e: School Quality or Student Success Indicator(s)

Note: Peer reviewers must separately review each School Quality or Student Success indicator that an SEA submits. For example, if an SEA submits one School Quality or Student Success indicator for high schools and a different School Quality or Student Success indicator for elementary and middle schools, then peer reviewers will provide feedback, using the criteria below, separately for each indicator. For any School Quality or Student Success indicator that does not apply to all grade spans, the SEA’s description must include the grade spans to which it does apply. (ESEA section 1111(c) (4) (B) (v))

- Does the SEA describe each School Quality or Student Success indicator used in its statewide accountability system for all public schools in the State?
- If the SEA uses a different indicator for each grade span, does it describe each indicator, including the grade span to which it applies?
- Does the indicator allow for meaningful differentiation in school performance?
- Is the indicator valid, reliable, comparable, used statewide in all schools (for the grade span to which it applies), and calculated in a consistent way?
- Can the indicator be disaggregated for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT lists out the school quality and success indicators on page 24 of the plan – including indicators of school climate, student engagement, and college and career readiness. These are differentiated by elementary, middle and high school. Student attendance is included across all school levels (p. 25). There is no analysis to determine its validity, reliability, and comparability statewide.</p> <p>MT does not indicate how they disaggregate; specifically, MT cannot disaggregate PBIS results.</p> <p>The use of attendance requires specific business rules in order to make the measure uniform across the State (i.e. the calculation must be consistent across the state).</p>
<i>Strengths</i>	<p>Peers commend MT for soliciting stakeholder feedback on program quality measures within the school quality indicator, which they intend to develop (p. 25).</p> <p>The use of the college and career indicator is a positive step and MT’s commitment to continue to develop the metrics is commendable.</p>
<i>Weaknesses</i>	<p>PBIS cannot be disaggregated by subgroup.</p> <p>The specific program quality components (e.g., the method to assign points for school climate) within the school quality indicator (Table F, p. 25) are not detailed. The suggestion of including metrics for creating positive school environments, using data effectively and implementing evidence-based practices with fidelity is noteworthy and establishes high expectations. There is little specificity in the plan outside of MT will “work” on adding these with 5 points assigned. More specifics in terms of metrics considered and timelines would strengthen the plan. For example, it is not clear how schools would earn points based on performance on this indicator.</p>

<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MT must define how program quality is measured. MT must identify how the measures will be disaggregated. MT must clarify how the points for this indicator are earned by a school.

A.4.v: Annual Meaningful Differentiation (ESEA section 1111(c) (4) (C))

A.4.v.a: State’s System of Annual Meaningful Differentiation

- Does the SEA describe its system of meaningfully differentiating, on an annual basis, all public schools in the State?
- Is the State’s system of annual meaningful differentiation based on all indicators in the State’s accountability system?
- Does the State’s system of annual meaningful differentiation include the performance of all students and each subgroup of students on each of the indicators in the State’s accountability system?

	<i>Peer Response</i>
<i>Peer Analysis</i>	On p. 26 MT describes a system that differentiates all public schools in MT on a yearly basis using all State indicators. However, the narrative does not sufficiently describe how scores on individual indicators are converted into points, which are summed to differentiate schools and student subgroups. Also, MT does not indicate whether the school quality indicator will be ready to use for accountability determinations in year 1. It appears that the use of the indicators in sum leads to meaningful differentiation.
<i>Strengths</i>	
<i>Weaknesses</i>	It appears that points are based on school ranks across grade spans, which may disadvantage some schools because points based on ranking within a grade span means that individual school performance can go up while the entire state goes down. Table G provides the number of points for each indicator, but it is not clear how the metrics are translated into points. It is not clear whether the school quality indicator will be available in time for implementation.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet</i>	

<i>this requirement</i>	
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A.4.v.b: Weighting of Indicators

- Does the SEA describe the weighting of each indicator in its system of annual meaningful differentiation, including how the weighting is adjusted for schools for which an indicator cannot be calculated due to the minimum number of students (e.g., for the Progress in Achieving English Language Proficiency indicator)?
- Do the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators each receive substantial weight individually?
- Do the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators receive, in the aggregate, much greater weight than the School Quality or Student Success indicator(s), in the aggregate?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The Plan provides a table (Table G, pg. 27) summarizing the indicators for schools with grades K-8 and high schools. Academic Achievement, Other Academic, and Graduation Rate receive substantial weight individually, at 25 or 30 point (out of 100 totals). English Learner Progress receives only a weight of 10 points, which is lower than Attendance and College/Career Ready indicators, and the same as STEM.</p> <p>Some peers felt that English Learner Progress is not receiving substantial weight.</p> <p>The School Quality/Student Success indicators receive, in the aggregate, much less weight overall (i.e., 35%) than the required indicators (65%). MT indicates that when minimum N is not met the points for that indicator are excluded from the denominator (p.26).</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>It is clear that the number of points that MT assigns to each indicator places increased emphasis on the academic achievement, EL proficiency, and the graduation rate indicators. It is less clear how performance on these indicators is translated into points.</p> <p>Some peers felt that the weight for ELP is not significantly substantial.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.v.c: If Applicable, Different Methodology for Annual Meaningful Differentiation

- If the SEA uses a different methodology or methodologies for annual meaningful differentiation than the one described in 4.v.a of the State’s plan for schools for which an accountability determination

cannot be made (e.g., P-2 schools), does it describe the different methodology or methodologies, including how the methodology or methodologies will be used to identify schools for comprehensive or targeted support and improvement?

- Does the SEA’s description of a different methodology indicate the type(s) of schools to which it applies?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT states that P-2 schools will be assigned the ranking of the next grade in the feeder school. It is unclear whether this means the assigned rank from the next feeder school or the next grade of the feeder school is used for the P-2 school. If simply from grade 3, then growth and STEM could not be calculated.</p> <p>This does not seem to be an ideal methodology, since there is no information about meaningful differentiation until students reach third grade and are out of the P-2 school and are included in accountability measures.</p> <p>There is no discussion of accountability for very small schools (N < 10).</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>MT indicates feeder school scores are primarily going to be used for P-2, but it is not clear which other schools this might apply to.</p> <p>Assigning a rating for a P-2 school by using the feeder school ranking is concerning given that “schools” may not feed accountability for results and this may not unveil issues (and needs for support) in P-2 schools.</p> <p>It is unclear whether the assigned rank from the next feeder school or the next grade of the feeder school is used for the P-2 school. If simply from grade 3, then growth and STEM could not be calculated.</p> <p>MT did not present a plan such as using multiple years or another strategy to include the 92 schools (that are not P-2) where the N is less than 10 for all students.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (# peer reviewer(s))</p> <p><input checked="" type="checkbox"/> No (4 peer reviewer(s))</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>MT must specify whether the assigned rank from the next feeder school or the next grade of the feeder school is used for P-2 schools.</p> <p>MT needs to present a plan such as using multiple years or another strategy to include the 92 schools.</p>

A.4.vi: Identification of Schools (ESEA section 1111(c) (4) (D), 1111(d) (2) (C)-(D))

A.4.vi.a Comprehensive Support and Improvement Schools—Lowest Performing

- Does the SEA describe its methodology to identify not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement

including, if applicable, how it averages data (e.g., does the State use a uniform averaging procedure across all schools)?

- Does the SEA’s methodology result in the identification of not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement?
- Does the SEA include the year in which it will first identify these schools for comprehensive support and improvement (i.e., does the timeline comply with the Department’s guidance)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT will begin identifying the lowest performing Title I schools (5%) per the indicators listed above in the 2018-2019 school year. High schools with a graduation rate lower than 67% will be included in addition to the bottom 5% based on ranking schools.</p> <p>It is not clear if the ranking to identify the lowest performing 5% of Title I schools will be done separately by school level, or across all Title I schools. However, it is not clear whether MT ranks schools from among Title I schools or from among all schools (the last sentence of p. 27 is unclear).</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>It appears that all grade spans will be on the same ranking which could result in one grade span having a significantly greater proportion of schools in the bottom 5% if MT does not identify the bottom 5% by grade span. Ranking within grade span guards against potential issues with the indicators.</p> <p>MT does not specify whether the procedure will result in not less than 5% of Title I schools being identified.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>MT must clarify that the procedure will result in not less than 5% of Title I schools being identified.</p> <p>MT should clarify whether rankings are based on all schools or grade spans and whether identification is by grade span or overall (e.g. the bottom 5% of all schools Vs. the bottom 5% of elementary schools, or middle schools, etc.).</p>

A.4.vi.b: Comprehensive Support and Improvement Schools—Low Graduation Rates

- Does the SEA describe its methodology to identify all public high schools in the State failing to graduate one-third or more of their students for comprehensive support and improvement, including: 1) a description of whether the SEA uses one or more extended-year adjusted cohort graduation rates in addition to the four-year adjusted cohort graduation rate and 2) if applicable, how the SEA averages data (e.g., does the State use a uniform averaging procedure across all schools)?
- Does the SEA’s methodology result in the identification of all public high schools in the State failing to graduate one-third or more of their students for comprehensive support and improvement?
- Does the SEA include the year in which it will first identify these schools for comprehensive support and improvement (i.e., does the timeline comply with the Department’s guidance)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MT will identify high schools for comprehensive support and improvement (CSI) beginning with the 2018-19 school years. The brief narrative (pg. 28)

	<p>sentence indicates MT will identify all public high schools with a graduation rate below 67% for comprehensive support and improvement.</p> <p>MT does not address the procedures used if the minimum n-size is not met, or if multiple years of data will be used. Hence, the methodology does not appear to identify all public high schools, unlike what the response on p.28 indicates.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	The MT plan does not address the procedures used if the minimum n-size is not met, or if multiple years of data will be used.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MT must describe how very small school graduation rates will be included to determine CSI status.

A.4.vi.c: Comprehensive Support and Improvement Schools—Additional Targeted Support Not Exiting Such Status

- Does the SEA describe its methodology to identify schools receiving Title I, Part A funds that have received additional targeted support under ESEA section 1111(d) (2) (C) (*i.e.*, based on identification as a school in which the performance of any subgroup of students, on its own, would lead to identification as one of the lowest-performing five percent) that have not satisfied the statewide exit criteria for such schools within a State-determined number of years?
- Does the SEA’s methodology result in the identification of such schools?
- Does the SEA include the year in which it will first identify these schools for comprehensive support and improvement (*i.e.*, does the timeline comply with the Department’s guidance)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	Some peers felt that the requirement was met because within 3 years, if an additional targeted support and improvement (TSI) school does not exceed the performance of the lowest performing 5% of Title I schools, it will be identified and designated to receive comprehensive support and improvement. Schools are initially identified in 2021-2022 (pg. 28). It was not clear to some reviewers what the basis of comparison is – <i>i.e.</i> , for additional targeted support is the bottom 5% of Title I schools comprised of the performance of all students or of only the performance of a subgroup.
<i>Strengths</i>	
<i>Weaknesses</i>	It is not clear what the term “all student subgroups” refers to (<i>i.e.</i> all student subgroups in aggregate – <i>e.g.</i> the average of them) or a conjunctive rule that requires all subgroups to improve beyond the bottom 5% score.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewer(s)) <input checked="" type="checkbox"/> No (2 peer reviewer(s))
<i>If no, describe the specific information or clarification that</i>	MT needs to further define how additional TSI school performance is compared to the bottom 5% of Title 1 schools— <i>i.e.</i> CSI schools.

<i>an SEA must provide to fully meet this requirement</i>	
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A.4.vi.d: Frequency of Identification

- Does the SEA include the frequency with which the State will identify each type of school for comprehensive support and improvement after the first year of identification?
- Does the SEA’s timeline result in identification of these schools at least once every three years?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MT will identify schools for Comprehensive Support and Improvement every three years, beginning with the 2018-19 school year (p. 28).
<i>Strengths</i>	There is a timeline and process in place (p. 28-29) for providing support to schools that have been identified for comprehensive support and improvement.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.vi.e: Targeted Support and Improvement Schools—“Consistently Underperforming” Subgroups

- Does the SEA describe its methodology to identify schools with one or more “consistently underperforming” subgroups of students, including its definition of “consistently underperforming”?
- Does the SEA’s methodology result in the identification of any school with one or more “consistently underperforming” subgroups of students?
- Is the methodology based on all indicators in the statewide system of annual meaningful differentiation?
- Does the SEA identify these schools annually?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MT will identify schools for targeted support and improvement annually if any subgroup has performed at a level equivalent to the performance of all students in the lowest performing five percent of schools for three years in a row (which defines consistently underperforming subgroups) (p. 29). Identification will begin in 2021-2022.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))

<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	
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A.4.vi.f: Targeted Support and Improvement Schools—Additional Targeted Support

- Does the SEA describe its methodology to identify schools in which the performance of any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State’s methodology under ESEA section 1111(c)(4)(D) (*i.e.*, the methodology described above in A.4.vi.a), including: 1) whether the methodology identifies these schools from among all public schools in the State or from among only the schools identified as schools with one or more consistently underperforming subgroups and 2) if applicable, how the SEA averages data (*e.g.*, does the State use a uniform averaging procedure across all schools)?
- Does the SEA’s methodology result in identification of such schools?
- Does the SEA include the year in which the State will first identify such schools (*i.e.*, does the timeline comply with the Department’s guidance)?
- Does the SEA include the frequency with which the State will identify such schools after the first year of identification?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MT’s plan specifies “A school with any subgroup performing at a level equivalent to the performance of schools in the lowest performing five percent will be identified for targeted support and improvement” (p. 29). Identification will begin in 2018-2019. The frequency of identification after the first year was not listed in this section. Peers believe it is every three years, according to information provided in section e above, but it is not specified in this response.
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The frequency of identification after the first year was not listed in this section</p> <p>This methodology is likely to create many additional TSI schools given that it is likely that a single subgroup’s performance can relatively easily be as low as the lowest performing 5%. MT should examine using the same identification process for both sets of TSI schools to determine whether a reasonable number of schools will end up in TSI.</p> <p>MT needs to clarify whether identification is from all schools or from among Title I schools only.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MT must provide the frequency of identification after the first year as this was not listed in this section.

A.4.vi.g: If Applicable, Additional Statewide Categories of Schools

- If the State chooses, at its discretion, to include additional statewide categories of schools, does the SEA describe those categories?

	<i>Peer Response</i>
<i>Peer Analysis</i>	N/A: The state has not included additional categories.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s)) <input checked="" type="checkbox"/> N/A
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.vii: Annual Measure of Achievement (ESEA section 1111(c) (4) (E) (iii))

- Does the SEA describe how it factors the requirement for 95 percent participation of all students and 95 percent of all students in each subgroup of students in statewide mathematics and reading/language arts assessments into the statewide accountability system?
- If applicable, does the SEA describe how the SEA differentiates its approach based on such factors as the number of subgroups in the school missing the participation rate requirement, the length of time over which the school has missed the requirement, or the degree to which the school missed the requirement (e.g., 92 percent participation rate vs. 70 percent participation)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT includes a statement of how it will address the situation in which the requirements of 95% participation of all students or all students in a subgroup are not met. It is not clear what the phrase “assigned the lowest average score on each measure” means in practice. That is, the average score of what group of students that is used is not clear.</p> <p>The approach does not differentiate based on any relevant factors (e.g. chronic low participation or one-time low participation).</p>
<i>Strengths</i>	MT takes missing student performance seriously and attempts to apply a rule that dis-incentivizes non-participation.
<i>Weaknesses</i>	<p>95% participation for small schools can be missed with a single student not participating.</p> <p>It is not clear what MT is intending to do with the lowest average score for missing students.</p> <p>There does not appear to be any differentiation in the approach based on any factors, so regardless of whether a school has chronically low participation</p>

	rates or one-time low rates, there is no change in approach. Similarly, all schools are treated the same regardless of the degree to which they missed the participation requirement.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MT must clarify what the specific procedure is to assign the lowest average score for missing student scores.

A.4.viii: Continued Support for School and Local Educational Agency Improvement (ESEA Section 1111(d) (3) (A))

A.4.viii.a: Exit Criteria for Comprehensive Support and Improvement Schools (ESEA section 1111(d) (3) (A) (i) (I))

- Does the SEA describe its statewide exit criteria for schools identified for comprehensive support and improvement, which may include how the exit criteria are aligned with the State’s long-term goals and measurements of interim progress?
- Does the SEA’s description include the number of years within which schools are expected to meet such criteria?
- Is the number of years no more than four years?
- Do the exit criteria ensure continued progress to improve student academic achievement and school success in the State (*e.g.*, do the exit criteria improve student outcomes and ensure that a school that exits no longer meets the criteria under which the school was identified)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT’s process for exiting Comprehensive Support and Improvement involves three criteria (pp. 29-30). A school must exit out of the lowest performing five percent of schools, and for high schools have improved graduation rates at or above 67 percent. Once schools have met these criteria, they need to demonstrate continuous improvement through meeting ELA and Math academic achievement goals, or show continual improvement in all components of a comprehensive needs assessment. Schools are expected to exit their status within 3 years.</p> <p>Some peers felt that the description met the minimum requirements while one peer felt that the description did not.</p> <p>Specifically, MT does not specify upon which year the bottom 5% are compared for exit – <i>e.g.</i> the year the school was identified or the year the school is attempting to exit.</p> <p>Schools must also demonstrate growth/continual improvement in addition to this (p. 31) so that they do not keep falling back into the pattern).</p> <p>Including additional criteria such as making progress on the elements of the comprehensive needs assessment is a potentially strong feature to ensure schools are making progress on multiple fronts. However, MT does not</p>

	provide specific evidence to suggest that the latter two exit criteria are associated with improved student outcomes (however they might be measured). MT does not describe how it will ensure that the response to the comprehensive needs assessment is based on evidence-based practices and grounded in implementation science and change management theory.
<i>Strengths</i>	Including additional criteria such as making progress on the elements of the comprehensive needs assessment is a potentially strong feature to ensure schools are making progress on multiple fronts. It is a strength that the system of support focuses on both operational and instructional components.
<i>Weaknesses</i>	MT does not provide specific evidence to suggest that the latter two exit criteria are associated with improved student outcomes (however they might be measured). MT does not describe how it will ensure that the response to the comprehensive needs assessment is based on evidence-based practices and grounded in implementation science and change management theory. MT does not specify upon which year the bottom 5% are compared for exit – e.g. the year the school was identified or the year the school is attempting to exit.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewer(s)) <input checked="" type="checkbox"/> No (1 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MT should confirm that all three exit criteria are on the same three year timeline. MT should specify upon which year the bottom 5% are compared for exit – e.g. the year the school was identified or the year the school is attempting to exit.

A.4.viii.b: Exit Criteria for Schools Receiving Additional Targeted Support (ESEA section 1111(d) (3) (A) (i) (II))

- Does the SEA describe its statewide exit criteria for schools receiving additional targeted support under ESEA section 1111(d) (2) (C), which may include how the exit criteria align with the State’s long-term goals and measurements of interim progress and the requirement that the goals and measurements of interim progress take into account the improvement necessary to close statewide proficiency and graduation rate gaps?
- Does the SEA’s description include the number of years within which schools are expected to meet such criteria?
- Do the exit criteria ensure continued progress to improve student academic achievement and school success in the State (e.g., do the exit criteria improve student outcomes for the subgroup or subgroups that led to the school’s identification and ensure that a school that exits no longer meets the criteria under which the school was identified)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	To exit each subgroup must perform higher than the bottom 5% (p. 31). MT will assess schools receiving additional targeted support on an annual basis. All subgroups must perform at a level higher than the

	<p>lowest performing five percent of schools, as determined in the annual meaningful differentiation process. The number of years in which schools are expected to meet the criteria is not explicitly mentioned within this section.</p> <p>The response to this question did not provide the number of years within which schools are expected to meet the exit criteria for additional targeted support (pg. 31).</p> <p>MT does not indicate how the criteria ensure continued success.</p> <p>It is unclear if performing higher than the lowest performing five percent of schools is comparing subgroup to subgroup</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The response to this question did not provide the number of years within which schools are expected to meet the exit criteria for Targeted Support (p. 31).</p> <p>MT does not indicate how the criteria ensure continued success.</p> <p>It is not clear within what time frame schools are expected to meet the exit criteria. For instance, it is not clear whether the criteria can be met in just the last year or whether multiple years of meeting the criteria are needed.</p> <p>Some peers felt that it is unclear if performing higher than the lowest performing five percent of schools is comparing subgroup to subgroup.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>MT must provide the number of years within which schools are expected to meet the exit criteria for additional targeted support.</p> <p>MT must indicate how they ensure continued success.</p> <p>MT should clarify whether school performance is considered in the last year or some aggregate of multiple years.</p> <p>MT should clarify whether the performance of the lowest 5% of schools used for comparison is based on the whole school's performance or the performance of subgroups.</p>

A.4.viii.c: More Rigorous Interventions (ESEA section 1111(d) (3) (A) (i) (I))

- Does the SEA describe the more rigorous State-determined action required for schools identified for comprehensive support and improvement that fail to meet the SEA's exit criteria within a State-determined number of years, which may include interventions that address school-level operations, such as changes in school staffing and budgeting or the school day and year?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT begins interventions once schools do not meet exit criteria by developing a 7 year plan based on a (new) comprehensive needs assessment) (pp. 31-32). The MT plan develops additional actions such as a three person support team. One peer felt that the plan does not identify evidence-based interventions likely to substantively impact school performance. Interventions do not include specific school-based restructuring or organizational elements.</p> <p>One peer felt that the needs assessment does not appear to be any different than the original needs assessment previously conducted, nor are there different criteria indicated for meeting needs assessment findings.</p> <p>Peers felt MT indicates that it will identify High Priority districts, but it is unclear when these districts are identified.</p>
<i>Strengths</i>	<p>MT intends to assist schools in conducting an additional comprehensive needs assessment that includes an assessment of operational, instructional, community, and family components. MT suggests that previous TA will be leveraged to provide supports to schools. Some peers felt that MT's recognition that system reform takes years and that MT is committed to providing schools and districts supports for 7 years is strength.</p>
<i>Weaknesses</i>	<p>No specifications were identified for the 7 year support plan, nor was it clear whether this is intended to serve as the more rigorous intervention for schools that do not meet exit criteria after three years.</p> <p>The listing of areas considered in the comprehensive needs assessment is broad. Given the schools status, it may be necessary to help the school prioritize and target efforts so that staff is not overwhelmed with changing too many practices at one time. It is good that experiences from prior technical assistance efforts will be leveraged to support schools in greater need; however, the plan does not include any data to substantiate that the prior technical assistance efforts led to results.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewer(s)) <input checked="" type="checkbox"/> No (1 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>MT should specify how the 7 year support plan results in more rigorous interventions that have clearly defined additional support, exit criteria, and consequences for not meeting needs assessment findings.</p>

A.4.viii.d: Resource Allocation Review (ESEA section 1111(d) (3) (A) (ii))

- Does the SEA describe how it will periodically review resource allocation to support school improvement in each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement?

	<i>Peer Response</i>
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<i>Peer Analysis</i>	<p>MT intends to monitor and assess the impact of the comprehensive support system every 3 years. The Plan includes a brief overview of the process for a comprehensive review conducted by MT every three years (p.32).</p> <p>MT does not provide specifics as to how it might reallocate funds based on findings.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>It is not clear how this aligns with comprehensive support schools (e.g. the review comes at the end of a CSI cycle at which point they exit or have failed to make sufficient progress. Also, there are no financial metrics provided for the review.</p> <p>MT suggests some potential indicators to monitor the comprehensive system of support; however, not many specifics are provided. For example, will there be specific targets they will try to achieve?</p> <p>MT does not provide specifics as to how it might reallocate funds based on findings.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.viii.e: Technical Assistance (ESEA section 1111(d) (3) (A) (iii))

- Does the SEA describe the technical assistance that it will provide to each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement?
- Are the technical assistance likely to improve student outcomes by, for example, 1) identifying State-approved evidence-based interventions; 2) supporting LEAs and schools in the development and implementation of support and improvement plans; and 3) differentiating the technical assistance?

<i>Peer Response</i>	
<i>Peer Analysis</i>	<p>MT will assign Office of Public Instruction (OPI) staff to districts to support developing improvement plans that include aligning budgets and programs. MT lists the types of support they will provide, including consultant services, support in conducting a comprehensive needs assessment, a listing of professional development providers, and assistance in analyzing the continuous improvement plans.</p> <p>One peer thought that MT did not meet the requirement because it lists elements but does not specify details of how district support will be differentiated.</p>
<i>Strengths</i>	<p>MT intends to align supports to schools and districts making sure they are aware of the technical assistance supports and resources that can help in</p>

	making progress on their continuous improvement plans. MT staff will help also in monitoring progress toward their goals.
<i>Weaknesses</i>	Some peers felt that differentiation was not evident (working with a district does not automatically assure differentiation if staff follow uniform procedures). While it is admirable that MT intends to ensure that districts and schools are aware of the resources to support improvement efforts, it is highly likely that schools that fall into this category will need much more than a listing of supports and resources to mobilize to the point of significant progress.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewer(s)) <input checked="" type="checkbox"/> No (1 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MT should specify how it will ensure differentiation in district support.

A.4.viii.f: If Applicable, Additional Optional Action

- If applicable, does the SEA describe the action that it will take to initiate additional improvement in any LEA with a significant number or percentage of schools that it consistently identifies for comprehensive support and improvement and are not meeting the State’s exit criteria or in any LEA with a significant number or percentage of schools implementing targeted support and improvement plans?

	<i>Peer Response</i>
<i>Peer Analysis</i>	N/A: MT does not identify any additional optional actions (p.34).
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s)) <input checked="" type="checkbox"/> N/A
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.5: Disproportionate Rates of Access to Educators (ESEA section 1111(g) (1) (B))

- Does the SEA describe the extent, if any that low-income children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers?

- Does the SEA describe the extent, if any, that minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers?
- Does the SEA describe the measures (e.g., data used to calculate the disproportionate rates) that it will use to evaluate and publicly report its progress with respect to how low-income and minority children are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers?⁴

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT referred to the implementation of the 2015 Equitable Access to Excellent Educators plan. MT does not include a definition of ineffective teachers, but does refer to out of field and inexperienced in the overview. MT indicates that a definition of ineffective teachers will be forthcoming by fall of 2018 (p. 34).</p> <p>MT’s narrative does not include data or sufficient information for peers to ascertain whether low-income and minority children in Title I schools are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers.</p> <p>MT does not make any explicit connections between inequitable accesses to effective teachers in the lowest performing schools.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>The response provides insufficient information and detail.</p> <p>MT suggests that a definition of ineffective teachers is forthcoming; however, it includes no specifics on how data is currently being reported using out of field and inexperienced in the definition. No current or existing data was reported in the plan or a detailed description in how this data was going to be collected and reported.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>MT must provide data identifying the extent to which low income and minority children in Title I schools are served in disproportionate rates by out of field, inexperienced, and ineffective teachers and how this will be reported.</p>

⁴ Consistent with ESEA section 1111(g)(1)(B), this description should not be construed as requiring a State to develop or implement a teacher, principal or other school leader evaluation system.

A.6: School Conditions (ESEA Section 1111(g) (1) (C))

- Does the SEA describe how it will support LEAs receiving assistance under Title I, Part A to improve school conditions for student learning?
- Does the SEA’s description include how it will support LEAs to reduce incidences of bullying and harassment?
- Does the SEA’s description include how it will support LEAs to reduce the overuse of discipline practices that remove students from the classroom?
- Does the SEA’s description include how it will support LEAs to reduce the use of aversive behavioral interventions that compromise student health and safety?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT indicates their support of creating positive working conditions and school climates by providing strong collaborative communities (p. 34) and by collaborating across systems.</p> <p>MT describes strategies to improve conditions for student learning, including the reduction of bullying and harassment, the reduction of discipline practices that remove students from the classroom, and practices that improve student health and safety.</p> <p>MT describes a number of initiative (p. 35-36) aimed at improving school conditions for student learning, including outreach to parents and professional development opportunities for educators. Bullying and harassment, avoiding discipline practices that remove students from the classroom, and reducing aversive behavioral interventions are all subsumed under the initiatives described.</p>
<i>Strengths</i>	<p>MT indicates they will support positive school environments through collaboration across systems with LEAs. They intend to focus on: “professional development in implementing a strong Multi-Tiered System of Supports (MTSS); mentoring and school counseling; bullying and harassment prevention; violence and suicide prevention; health enhancement; substance use prevention; mental health; traffic education; tobacco use prevention; and natural, technology, and man-made disaster preparation and response plans. School psychologists and counselors (will) play a critical role in the efforts listed above,” p. 35.</p> <p>While MT lists a number of resources and state efforts to support educator capacity, little specifics on how these efforts will be used strategically to reduce incidences of bullying and harassment and how the state with support the LEAs in reducing the overuse of discipline practices are noted (p. 34). It is not clear how these resources and initiatives will be applied differently than applied previously.</p>
<i>Weaknesses</i>	<p>While MT lists a number of resources and state efforts to support educator capacity, little specifics on how these efforts will be used strategically to reduce incidences of bullying and harassment and how the state with support the LEAs in reducing the overuse of discipline practices are noted (p. 34). It is not clear how these resources and initiatives will be applied differently than applied previously.</p>

<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.7: School Transitions (ESEA 1111(g) (1) (D))

- Does the SEA describe how it will support LEAs receiving assistance under Title I, Part A in meeting the needs of students at all levels of schooling (particularly students in the middle grades and high school)?
- Does the SEA’s description include how it will work with LEAs to provide effective transitions of students to middle grades and high school to decrease the risk of students dropping out?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MT realizes that there are four key transitions: EC to K, ES to MS, MS to HS, and HS to Career or College (pp. 37-39). MT identifies multiple strategies within each transition. Such as early warning systems and multi-tiered system of supports. This includes ones to prevent dropouts, prepare for college and careers, prepare for transition to high school, and increase the likelihood for academic success in kindergarten and middle school.
<i>Strengths</i>	MT recognizes the importance of different transitions and has developed a list of potential interventions – including early childhood and secondary transitions.
<i>Weaknesses</i>	It is not clear to what extent any of the purported interventions have any evidence to suggest they can be successful. Moreover, it is not clear whether there is a system to order interventions and consider the cost implications.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

SECTION E: TITLE III, PART A, SUBPART 1: ENGLISH LANGUAGE ACQUISITION AND ENHANCEMENT

E.1: Entrance and Exit Procedures (ESEA section 3113(b) (2))

- Does the SEA describe how it will establish and implement, with timely and meaningful consultation with LEAs representing the geographic diversity of the State, standardized statewide entrance and exit procedures for English learners, including a description of how, if applicable, a State will ensure

that local input included in the exit procedures, such as teacher input or a portfolio, will be applied statewide?

- Does the SEA’s description include an assurance that all students who may be English learners are assessed for such status within 30 days of enrollment in a school in the State?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT will use standardized entry procedures that include a home language survey upon entry and the WIDA screener within 30 days. MT also created a language checklist for teachers to use that can also place a student into services. Exit criteria are based on ACCESS 2.0 MT also proposes to, “Each school will develop a plan to review EL data and make a determination if a student who has obtained proficient scores is performing at grade level in English and is able to fully participate in society,” p.65.</p> <p>One peer felt that the plan does not provide details as to what “performing at grade level in English and is able to fully participate in society” actually means. One peer felt that grade level performance may be more stringent than necessary depending on performance of English only student performance on state English assessments (i.e. are ELs held to a higher standard than English only students).</p> <p>MT’s description of stakeholder participation is not specific.</p>
<i>Strengths</i>	<p>Language checklist is responsive to state specific context.</p> <p>The state’s use of standardized WIDA assessments to place ELs and to document their progress over time is strength, as is their use of not only a home language survey but also a Teacher Observation Checklist to identify students struggling with English.</p>
<i>Weaknesses</i>	<p>MT does not ensure that the checklists are being used with fidelity across the state.</p> <p>Exit criteria seem somewhat stringent and may hold students from opportunities to learn if they are not exited in an efficient manner.</p> <p>It is not clear whether school-specific procedures are in fact uniform across the state in implementation. Specifically the teacher opinion on whether a student can participate in society would require a state-wide systematic rubric.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (3 peer reviewer(s))</p> <p><input checked="" type="checkbox"/> No (1 peer reviewer(s))</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>MT should clarify how it intends to ensure that school-developed procedures are uniform across the state, including what is meant by participating in society.</p>

E.2: SEA Support for English Learner Progress (ESEA section 3113(b) (6))

- Does the SEA describe how it will assist eligible entities in meeting the State-designed long-term goal for English language proficiency established under ESEA section 1111(c)(4)(A)(ii), including

measurements of interim progress towards meeting such goal, based on the State’s English language proficiency assessment under ESEA section 1111(b)(2)(G)?

- Does the SEA describe how it will assist eligible entities in helping to ensure that English learners meet challenging State academic standards?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The Plan provides a thorough description of support from MT for English Learner students, including resources available for ensuring continual progress toward meeting English proficiency for American Indian ELs, and resources in aligning instruction with MT academic standards. The Continuous Support Improvement Plan will be leveraged to create a support for ELs. MT will provide online resources and supports.</p> <p>There is not a lot of detail provided, so it is difficult to know whether these strategies (to support academic language development) would also be appropriate for the other (smaller) groups of ELs in the state (speakers of Spanish and German).</p>
<i>Strengths</i>	<p>MT appears to be response to specific needs of the State, specifically the academic language needs of American Indians.</p> <p>The fact that MT is a WIDA member also means it has access to WIDA professional development initiatives.</p>
<i>Weaknesses</i>	N/A
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

E.3: Monitoring and Technical Assistance (ESEA section 3113(b) (8))

- Does the SEA describe how it will monitor the progress of each eligible entity receiving a Title III, Part A sub grant in helping English learners achieve English language proficiency?
- Does the SEA describe the steps it will take to further assist eligible entities if the strategies funded under Title III, Part A are not effective, such as by providing technical assistance and support on how to modify such strategies?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MT uses the E-grant system. MT considers that some districts receive no or little funding and attempt to provide additional support. MT has developed an English Learner Toolkit (p. 64).</p> <p>MT indicates that there are relatively few Title III, Part A sub grants in the State and that many times the recipients are part of a consortium because of the small numbers of ELs in any one area (p. 65). MT indicates that Title I</p>

	and Title III monitoring are being combined this year to provide more cohesive monitoring and support. MT outlines that it will provide support when strategies are not effective, including by providing options available through WIDA's professional development network.
<i>Strengths</i>	<p>The plan indicates that Title I and Title III monitoring are being combined this year to provide more cohesive monitoring and support.</p> <p>Being a WIDA member certainly gives a state with a small EL population more technical assistance options than it would otherwise have at its disposal.</p>
<i>Weaknesses</i>	While the response provide list of potential supports and links to a toolkit, there is little substantiated evidence that these interventions and supports have had a substantive impact on the progress of ELs.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	